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Attorneys for Defendant,
THE PERMANENTE MEDICAL GROUP, INC.

UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF CALIFORNIA – SACRAMENTO DIVISION

JULIE AMORUSO,

Plaintiff,

v.

THE PERMANENTE MEDICAL GROUP, a
California corporation; and KAISER
FOUNDATION HOSPITALS, a California
corporation, collectively dba KAISER
PERMANENTE SOUTH SACRAMENTO
MEDICAL CENTER, KAISER PERMANENTE
ROSEVILLE MEDICAL CENTER and
KAISER PERMANENTE STOCKTON
FACILITY,

Defendants.

Case No. 2:20-CV-01335-KJM-DB

**JOINT STIPULATION AND SECOND
REQUEST FOR CONTINUANCE OF
PRETRIAL DEADLINES AND
[PROPOSED] ORDER**

Complaint Filed: July 6, 2020
Trial Date: TBD

Counsel for Plaintiff JULIE AMORUSO (“Plaintiff”) and Defendant THE
PERMANENTE MEDICAL GROUP, INC. (“Defendant”), (collectively referred to as the

“Parties”), hereby enter into the following Stipulation and request the Court to extend certain pretrial deadlines, pursuant to applicable Local Rules:

1. This is an action for alleged violation of Title VII of the Civil Rights Act of 1964: Failure or Refusal to Hire on Basis of Religion; Failure to Provide Religious Accommodation; and Disparate Impact on the Basis of Religion; and in violation of California Fair Employment Housing Act: Refusal to Hire on the Basis of Religious Creed; Failure to Provide Religious Accommodation; and Disparate Impact on behalf of Religion. The Parties have engaged in written discovery. No trial date has been set at this time. Depositions of Plaintiff and fact witnesses are being scheduled for completion in the next 60 – 90 days.

2. Good cause exists to continue the pretrial deadlines because the Parties have been unable to complete depositions, and may wish to engage in further post-deposition discovery and engage in informal resolution discussions. Defendant and its employees, as healthcare providers, have been particularly impacted by the COVID-19 pandemic, in particular due the current rise of positive cases associated with Omicron variant, which has limited the availability of employees for deposition and completion of discovery. Further, Defendant has been making diligent efforts to complete the collection of data requested by Plaintiff in discovery. Due to unforeseen circumstances, the collection of that data was more complex than the Parties anticipated. However, Defendant has now been able complete its research and is a position to provide the requested information to Plaintiff prior to depositions. Because no trial date has been set in this matter no prejudice will be suffered by the Parties and the Court’s docket will not be adversely impacted by granting this request. Plaintiff does not object to this second request for a continuance of pretrial deadlines.

3. The Parties hereby stipulate to the following new dates and request the Court to modify the scheduling order accordingly:

<u>CATEGORY</u>	<u>PRIOR DEADLINE</u>	<u>PROPOSED DEADLINE</u>
Fact Discovery Cut-Off	January 28, 2022	April 28, 2022
Expert Disclosures	January 21, 2022	April 21, 2022

1	Rebuttal Expert Witnesses Exchange	February 15, 2022	May 16, 2022
2			
3	Expert Discovery Cut-Off	April 1, 2022	June 30, 2022
4	Dispositive Motions	April 4, 2022	July 13, 2022

5 It is so AGREED.

6 Date: January 14, 2022

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8 By: /s/ Matthew B. McReynolds [Auth. 01.14.22]

KEVIN T. SNIDER

MATTHEW B. MCREYNOLDS

Attorneys for Plaintiff

JULIE AMORUSO

12 Date: January 14, 2022

JACKSON LEWIS P.C.

14 By: /s/ Michael J. Christian

MICHAEL J. CHRISTIAN

SHANE R. LARSEN

Attorneys for Defendant

THE PERMANENTE MEDICAL GROUP,
INC.

ORDER

The Court, having considered the foregoing stipulation of the parties, and good cause appearing therefor, makes the following order:

IT IS ORDERED THAT THE PRETRIAL DEADLINES ARE CONTINUED AS FOLLOW:

<u>CATEGORY</u>	<u>ORIGINAL DEADLINE</u>	<u>AMENDED DEADLINE</u>	<u>SECOND AMENDED DEADLINE</u>
Fact Discovery Cut-Off	October 15, 2021	January 28, 2022	April 28, 2022
Expert Disclosures	October 7, 2021	January 21, 2022	April 21, 2022
Rebuttal Expert Witnesses Exchange	November 1, 2021	February 15, 2022	May 16, 2022
Expert Discovery Cut-Off	December 15, 2021	April 1, 2022	June 30, 2022
Dispositive Motions	January 21, 2021	April 4, 2022	July 29, 2022

IT IS SO ORDERED.

DATED: January 18, 2022.


CHIEF UNITED STATES DISTRICT JUDGE